

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	

NOTICE OF PROPOSED RULEMAKING

Adopted: May 27, 1999 Released: June 2, 1999

Comment Date: July 30, 1999
Reply Comment Date: August 30, 1999

REPLY COMMENTS OF NENA¹

The National Emergency Number Association (NENA) hereby submits its separate Reply Comments on the above-captioned Notice of Proposed Rulemaking reference Number Resource Optimization, CC Docket No. 99-200.

The National Emergency Number Association (“NENA”) submits this reply to the comments of others in the captioned proceeding. In its opening comments of July 30, 1999, NENA called for early adoption of number pooling within existing rate centers and for deferral of rate center

consolidation (“RCC”) until 9-1-1 system redesign could eliminate or minimize the difficulties for default (“no record found”) routing of 9-1-1 calls. Whatever methods of number conservation are applied:

A long-term plan is obviously desirable for number resource optimization, with interim phases consistent with the long-term plan. This would tend to avoid interim measures that turn out to be contradictory over time. . . .NENA strongly recommends that public safety interests and 9-1-1 service system providers be directly involved in both the long-term and interim planning process, both nationally and at the state level. The FCC should require this.

(Comments, 4, emphasis added)

There is widespread support for number pooling, especially among state commissions and other public bodies, but the record is mixed on the sequencing of that step in relation to RCC.

TX-ACSEC and the allied Texas emergency communications districts observe that the pros and cons of RCC are “fact-specific” and highly dependent on variable 9-1-1 Selective Routing switch boundaries, trunking arrangements and ready availability of new default routings. (TX-ACSEC Comments, 2-3) The California and Virginia public service commissions are more negative on RCC, particularly as it may affect local calling rates, while a number of competitive carriers believe that RCC should precede use

¹ These comments filed by NENA are in addition to the comments filed jointly by NENA and APCO on the same date.

of other number conservation methods. However, USTA and certain state commissions (Texas, Pennsylvania) speak against RCC as a mandated prerequisite to number pooling, for example, and believe that its use must be discretionary with the state regulatory authorities.

The unifying element in this mixed picture is the importance of local and state decision-making and the need to involve 9-1-1 service system knowledgeable providers and public safety call-taking and responding organizations in the process as early as possible. NENA reiterates that FCC delegation of authority in number optimization to non-federal regulatory bodies should carry with it the requirement of such public safety involvement.

There is also significant support for NENA's view that long-term planning, including 9-1-1 network redesign, is a critical framework for shorter-term relief measures. Deploring "band-aid type fixes," Illinois NENA separately points out that the default routing issues associated with RCC arise because 9-1-1 networks typically are not state-of-the-art:

The networks must be improved to virtually eliminate ANI failures and permit expanded handling and transferring of 9-1-1 calls. The SS7 technology used today for local number portability and pooling can provide the needed 9-1-1 network improvements.

(Comments, 2, 9) In addition to SS7, it should be recognized that the Selective Routing capabilities must be improved to allow expanded call transfer abilities. State commissions can and should require or encourage such improvements in the 9-1-1 telephone networks within their jurisdictions. In addition, very timely input and update of the data bases controlling 9-1-1 call routing is critical.

The Colorado Public Safety Commission identifies the critical elements of 9-1-1 network upgrade in its state and declares: “Once the 911 network can be redesigned without NXX-rate center dependence, the ultimate pooling solution will not [affect] the 911 delivery.” (Comments, 10)

NENA endorses the need for an interactive voice response (“IVR”) system “to identify the local service provider responsible for a phone number.” With increased local competition including number portability, and the associated push to economize on number assignments, it is no longer possible to identify the carrier responsible for an emergency call by the NXX in the calling number.

Conclusion. While there is no clear consensus on the nature and sequence of steps toward number optimization, it is virtually undisputed that public safety call-taking and 9-1-1 system provider organizations must be involved in the shorter and longer-term planning. NENA urges the FCC,

through its control of the delegation of numbering authority, to see that emergency communications issues and representatives, including NENA, are consistently part of this important process.

Respectfully submitted,

NATIONAL EMERGENCY NUMBER ASSOCIATION

By: _____

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